

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PAFFORD TO INTERROGATORIES OF  
THE NATIONAL NEWSPAPER ASSOCIATION  
(NNA/USPS-T1-13-14)

The United States Postal Service hereby provides responses of witness Pafford to the following interrogatories of the National Newspaper Association: NNA/USPS-T1-13-14, filed on September 12, 1997.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

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September 26, 1997

RESPONSES OF USPS WITNESS PAFFORD TO INTERROGATORIES  
OF THE NATIONAL NEWSPAPER ASSOCIATION

NNA/USPS-T1-13. Please confirm that within-county revenue and piece data collected from post offices that are not automated on the PERMIT system are compiled from sample data. If you cannot confirm, please explain.

RESPONSE:

NNA/USPS-T1-13. Not confirmed. The non-automated offices' data constitute an ongoing census of the within county activity at these offices.

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RESPONSES OF USPS WITNESS PAFFORD TO INTERROGATORIES  
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NNA/USPS-T1-14. Please state the number of post offices from which data currently are collected on the PERMIT system and estimate the percentage of within-county volumes attributed to these offices. Please state the number of post offices currently on the non-automated panel and estimate the percentage of within-county volumes attributed to those offices.

RESPONSE:

NNA/USPS-T1-14. Data were collected from 1,779 PERMIT System offices and account for an estimated 62% of the estimated total within county volume for PQ 3, FY 1997. This is the most "current" data available. For the same period, there were 92 offices in the non-automated panel accounting for an estimated 38% of the estimated total within county volume. The request asks for "current" counts and estimated percentages. PQ 3 FY 1997 is the most recent time period for which such estimates are available.

## DECLARATION

I, Bradley V. Pafford, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



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Dated: 9-26-97

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Anne B. Reynolds

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